

# EXHIBIT 8

VOLUME: I  
PAGES: 1-95

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

Civil Action No. 04-11948-RGS

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SEYED MOHSEN HOSSEINE-SEDEHY, )  
Plaintiff )

vs. )

ERIN T. WITHINGTON and )  
THE CITY OF BOSTON, )  
Defendants )

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DEPOSITION OF MOHSEN HOSSEINI, a  
witness called on behalf of the Defendants,  
pursuant to the Massachusetts Rules of Civil  
Procedure, before Kelly G. Patterson, a  
Notary Public in and for the Commonwealth of  
Massachusetts, at the Law Department of City  
Hall, Room 615, Boston, Massachusetts, on  
Friday, October 14, 2005, commencing at  
9:23 a.m.

1 the record, Gerard. All objections, except  
2 as to form, are reserved until the time of  
3 trial, as well as motions to strike. You  
4 want your witness to read and sign and you  
5 waive the notary within 30 days?

6 MR. BUTLER: Yes.

7 MS. LITSAS: And you waive filing  
8 and all that?

9 MR. BUTLER: Yes.

10 MS. LITSAS: Okay. Great.

11 Q. Mr. -- could you please help me out and  
12 state your name for the record?

13 A. I go by Mohsen Hosseini.

14 Q. So to pronounce it correctly, it's  
15 Mr. Hosseini?

16 A. Yes.

17 Q. Could you just, for the stenographer, spell  
18 your first and last name for the record?

19 A. My first name is M-o-h-s-e-n. Last name,  
20 H-o-s-s-e-i-n-i.

21 Q. Great. Thank you. I'm just going to ask  
22 you some questions about your background,  
23 and before I do that, have you ever had your  
24 deposition taken before in a setting such as

1 degree, 1984. Master's degree, 1986.

2 Q. Were you living in Iowa at that time?

3 A. Yes, ma'am.

4 Q. How long did you live in Iowa?

5 A. I lived in Iowa from 1979 to 1986.

6 Q. When did you move to Massachusetts?

7 A. I moved to Massachusetts in 2000, 2001.

8 Q. Is English your first language or your  
9 second language?

10 A. My second language.

11 Q. What is your first language?

12 A. Pharsi or Persian.

13 Q. You have no problem understanding English,  
14 so there's no need for an interpreter today?

15 A. With the exception of my thick accent, no, I  
16 do not.

17 Q. My father has been in the United States for  
18 40 years, and he's originally born in Greece  
19 and he still has a very thick accent.

20 A. Unfortunately, my accent arose from speaking  
21 other languages.

22 Q. What other languages do you speak?

23 A. I speak Turkish and I can babble some  
24 Spanish and French.

Page 7

Page 9

1 this?

2 A. No.

3 Q. I guess the first question I have is just  
4 some background information. When were you  
5 born, Mr. Hosseini?

6 A. I was born in Turan, Iran.

7 Q. When was that?

8 A. I was born October 11, 1961.

9 Q. So it was just your birthday, happy  
10 birthday.

11 A. Thank you.

12 Q. How long have you been residing in the  
13 United States?

14 A. I came to the United States at the age of  
15 16.

16 Q. Did you receive education in the United  
17 States?

18 A. Yes, I came for the purpose of education. I  
19 got my bachelor degree in electrical  
20 engineering and my master's degree in  
21 applied mathematics.

22 Q. Where did you get your bachelor's degree and  
23 then your master's degree?

24 A. University of Iowa City, Iowa. Bachelor's

1 Q. That's wonderful. I never had an ability  
2 for linguistics, so I'm always impressed by  
3 people with the ability to master more than  
4 one. Backtracking a lit bit, Mr. Hosseini,  
5 you said you moved to Massachusetts in 2001.  
6 Where did you live before then, was it Iowa  
7 or was there someplace in between?

8 A. Seattle, Washington.

9 Q. How long did you live there?

10 A. I lived there between 1989 and the time we  
11 moved to Massachusetts.

12 Q. Were you employed in Seattle, Washington?

13 A. Yes, sir, I was.

14 Q. What was your position?

15 A. I was a general foreman for Ges Exposition  
16 Services.

17 Q. What did your position involve?

18 A. My responsibilities was to oversee the  
19 installation of trade shows and special  
20 events, organizing and running the crews,  
21 and coming back with happy clients.

22 Q. Did you also maintain this position when you  
23 moved to Massachusetts after Seattle?

24 A. Yes, ma'am.

3 (Pages 6 to 9)

1 Q. You held the same responsibilities for Ges?  
 2 A. Yes, ma'am.  
 3 Q. Were you employed at any other company other  
 4 than Ges?  
 5 A. No, ma'am.  
 6 Q. Has Ges been your sole employer since 1989?  
 7 A. I worked one job in, I'm not even going to  
 8 try to remember the year, for a company  
 9 called Triumph Event Services in Seattle  
 10 Washington. Ges was trying something new at  
 11 the time allowing their foremen to explore.  
 12 The job was so profitable for the competitor  
 13 that they immediately changed it over, so  
 14 with the exception of two weeks working for  
 15 Triumph, I've worked for Ges since 1989.  
 16 Q. Okay. Thank you. Where do you currently  
 17 reside?  
 18 A. Multiple places, ma'am.  
 19 Q. Okay.  
 20 A. My family lives in Jacksonville, North  
 21 Carolina where my wife is a dentist in the  
 22 United States Navy.  
 23 Q. That's wonderful.  
 24 A. I also have a rental residence in Teaneck,

1 to travel with my wife. See, I travel a lot  
 2 myself.  
 3 Q. I see. This is through Ges?  
 4 A. Since moving to the northeast, yes, I travel  
 5 frequently.  
 6 Q. Could you just tell me your social security  
 7 number?  
 8 A. 485-94-4815.  
 9 Q. How many children do you have?  
 10 A. One.  
 11 Q. How old is your child?  
 12 A. My son is seven years old.  
 13 Q. At the time of the incident that gave rise  
 14 to this lawsuit you've filed, where were you  
 15 were you working, at Ges?  
 16 A. Yes, ma'am.  
 17 Q. Was there a particular location within  
 18 Massachusetts that you were working?  
 19 A. I was working at Hynes Convention Center.  
 20 Q. What was your responsibility at the Hynes  
 21 Convention Center?  
 22 A. I was the general foreman in charge of the  
 23 job.  
 24 Q. Could you describe for me your

Page 11

1 New Jersey, where our Ges main office in the  
 2 northeast is located in Teterboro, New  
 3 Jersey.  
 4 Q. What is the address for that location?  
 5 A. 125 North Street, Teterboro, New Jersey. I  
 6 don't remember the zip.  
 7 Q. That's okay.  
 8 A. I also have a condo here in Charlestown,  
 9 Massachusetts.  
 10 Q. What is the Charlestown address?  
 11 A. 106 13th Street, Unit No. 120, Charlestown,  
 12 Mass., 02129.  
 13 Q. Thank you. In terms of your North Carolina  
 14 address, could you tell me what the street  
 15 address is for that location?  
 16 A. 2002 Colony Plaza, Jacksonville, North  
 17 Carolina, 28546.  
 18 Q. Is there one address that's your primary  
 19 residence as opposed to the others?  
 20 A. No, ma'am, because I have a main address in  
 21 Seattle, Washington, also.  
 22 Q. What's the address there?  
 23 A. 10509 Rustic Road South, Seattle,  
 24 Washington, 98178, so I choose for my mail

Page 13

1 responsibilities in that position?  
 2 A. My job is to start, when given a trade show,  
 3 a special event, to study all aspects of the  
 4 job, run the reports, load the proper  
 5 equipment or give direction to the warehouse  
 6 to load the proper equipment to send to show  
 7 site. At show site, in this situation in  
 8 Boston, using Boston Teamster's, off-load  
 9 the equipment, set the floor, get it ready  
 10 for our clients to arrive. Perform the  
 11 trade show, whatever function may be,  
 12 dismantle the trade show, load it back into  
 13 the trucks, and get it back to the  
 14 warehouse. My position or my goal in all  
 15 these jobs is to attain the most profitable  
 16 situation for the company. Obviously, it's  
 17 a for-profit company, so through being exact  
 18 in the equipment and not rolling too many  
 19 trailers on the road, wasting the gas, the  
 20 tolls, driver time, or on the show floor,  
 21 managing the labor, directing the right  
 22 path, so they can perform the task within a  
 23 timeline which would add to the profitability  
 24 of the show.



1 Q. So your role is, in many ways, a supervisory  
2 role?

3 A. Exactly, ma'am.

4 Q. Your responsibility is to execute the  
5 project in the most efficient and effective  
6 manner?

7 A. Exactly.

8 Q. That also requires you to organize crews and  
9 other employees in a managerial format?

10 A. Yes, ma'am. My task is multi, but when it  
11 comes to labor, I have to manage the labor  
12 and the crews well in advance, decide how  
13 many people I need to use for each given  
14 shift, each given day, and manage it to the  
15 best of my abilities.

16 Q. Do you have a staff when you are executing  
17 these managerial roles, or are you the main  
18 person that interacts with the crew and the  
19 other intermediaries involved in the  
20 project?

21 MR. BUTLER: Excuse me, I object  
22 only as to timeframe. I assume you're  
23 talking about March 22.

24 Q. Yes, March 22, 2004.

1 A. At the time, I was an hourly employee. At  
2 the time I did report to Stephen Casterline.

3 Q. You're saying hourly employee at that time,  
4 is that a distinction that's important to  
5 why you would report to Mr. Casterline?

6 A. Right now, I am the senior operation manager  
7 for Ges Exploration Services, and Stephen  
8 Casterline reports to me.

9 Q. You've received a promotion since that time?

10 A. I took a salary position with the company.

11 Q. Previously, were you not a salary employee  
12 but a contract?

13 A. I was a union employee.

14 Q. What union did you belong to?

15 A. Carpenter's Union Local 1797, Wrentham,  
16 Washington.

17 Q. What prompted you to change from the union  
18 to a salary position?

19 A. Circumstances after this incident.

20 Q. Could you tell me a little bit about what  
21 you mean by that?

22 A. Ges elected not to have me work in city of  
23 Boston after this incident.

24 Q. Okay.

Page 15

1 A. Yes, I did have a staff. Especially Hynes  
2 Convention Center being multi level, you  
3 need multi staff to oversee the projects.

4 Q. Did you have a primary assistant who works  
5 with you?

6 A. Actually, at the time, I was training Ges  
7 supervisor, and I had another supervisor,  
8 and my direct report at the time, which was  
9 the senior operation manager, was at the  
10 show site, also.

11 Q. Okay. Let's backtrack a little bit. Who  
12 was the supervisor you were training?

13 A. Corey Tang, who is now an operation manager  
14 with Ges.

15 Q. Who were the other main assistants for you?

16 A. Dave Sroka was --

17 Q. Can you spell that for me?

18 A. S-r-o-k-a. Dave was a supervisor at loading  
19 dock, and Stephen Casterline was the senior  
20 operation manager for the show.

21 Q. You reported to Stephen Casterline?

22 A. At the time, I was hourly employee. Yes,  
23 ma'am.

24 Q. I'm sorry, I couldn't understand --

Page 17

1 A. At the time, they had me traveling -- I  
2 shouldn't say Ges, I should say the general  
3 manager at the time, Mary Simons, who is not  
4 the general manager anymore, elected for me  
5 not to work in Boston, even after my  
6 exoneration. With that said, I performed  
7 most of my job duties in New York, New  
8 Jersey area, where, not knowing my future,  
9 they threw a salary position in front of me  
10 and I accepted it.

11 Q. What do you mean "not knowing my future"?

12 A. At the time, my family was living in Boston  
13 and I was away from my family, and since  
14 then, I've been away from my family on a  
15 continuous basis.

16 Q. Is that because you are a salary employee as  
17 opposed to a contract employee? What is the  
18 reason for the move of your family to North  
19 Carolina?

20 A. The move of my family to North Carolina is  
21 because of my wife. It has nothing to do  
22 with my job. She's in Camp Lejeune in North  
23 Carolina. My wife was a Tuft's Dental  
24 student while we were in Boston and that's

5 (Pages 14 to 17)